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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:

MOSDOS CHOFETZ CHAIM INC.,

Debtor.

Chapter 11 – Post Confirmation

Case No. 12-23616 (RDD)

CONGREGANTS OF MOSDOS CHOFETZ CHAIM  
INC. A/K/A KIRYAS RADIN,

Plaintiffs,

- against -

Adv. Proc. No. 21-7023 (RDD)

MOSDOS CHOFETZ CHAIM INC., CHOFETZ  
CHAIM INC., TBG RADIN LLC, SHEM OLAM,  
LLC, CONGREGATION RADIN DEVELOPMENT  
INC., ARYEH ZAKS, BEATRICE WALDMAN  
ZAKS, MENDEL ZAKS, GITTEL ZAKS LAYOSH,  
ELIYAHU LAYOSH, SAMUEL MARKOWITZ,  
DEBORAH ZAKS HILLMAN, YOM T. HENIG,  
STEVEN GREEN, DANIEL GREEN, ABRAHAM  
ZAKS and STERLING NATIONAL BANK,

Defendants.

**DECLARATION OF  
DANIEL S. ALTER**

DANIEL S. ALTER, under penalty of perjury and pursuant to 28 U.S.C. § 1746, submits this declaration in connection with the appeal bonds obtained by nonparties Rabbi Mayer Zaks, Sima Zaks Weintraub, Shimon Zaks, Nachum Z. Brody, Yisroel Hochman, and Faigy Hochman (collectively, “Stay Movants”) in compliance with this Court’s order of June 3, 2022 (“June 3<sup>rd</sup> Order”).

1. I am an attorney for the Stay Movants, and I make this declaration based upon my personal knowledge.
2. Attached hereto as Exhibit A are true and correct copies of the appeal bonds issued today by Great American Insurance Co., 201 East 5<sup>th</sup> Street, Cincinnati, OH 45202, in favor of Congregation Radin Development Inc. (“CRDI Bond”) and the Clerk of the United States Bankruptcy Court for the Southern District of New York (“Clerk’s Bond”).
3. The CRDI Bond is in the amount of \$42,225 and secures the Stay Movants’ payments for the use and custody of their homes for May, June, and July 2022, as directed by the June 3<sup>rd</sup> Order.
4. The Clerk’s Bond is in the amount of \$60,000 and secures the Stay Movants’ payments for any coercive sanctions incurred during June and July 2022, as directed by the June 3<sup>rd</sup> Order.
5. The Stay Movants will promptly forward to CRDI and the Clerk of Court the original bond documentation when they receive it from the surety. That documentation is expected to arrive by early next week.

Dated: White Plains, New York  
June 10, 2022

**/s/ DANIEL S. ALTER**

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Daniel S. Alter